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January 19, 2017

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Via Electronic Filing

Ex parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: *Technology Transitions*, GN Docket No. 13-5; *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353

Dear Ms. Dortch:

Attached please find AT&T's report on activities related to the technology transition in its Wire Centers Trials¹ in Carbon Hill, AL and West Delray Beach, FL through the third quarter of 2016.²

In 2014, AT&T began the Wire Center Trials with the primary goal of identifying and resolving operational, technical, and public policy issues associated with migrating TDM service customers off such services by a date certain to next generation services. As highlighted in the attached Report, AT&T has made progress in achieving many of its goals for the Trials. For example, AT&T's wire center trial activity accelerated and increased the dialogue about completing the TDM-to-IP services transition, and about AT&T's replacement services with key stakeholders and a variety of consumer segments including persons with disabilities, as well as CLECs, utilities, businesses, and government agencies, such as the Department of Homeland

¹ See AT&T Wire Center Trial Proposal, Wire Center Operating Plan at 53-55, *Technology Transitions*, GN Docket No. 13-5; *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353, (Feb. 27, 2014).

² This Final Report contains highly confidential information entitled to protection pursuant to the terms of the Protective Order and Second Protective Order in these dockets. *Technology Transitions*, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Protective Order, DA 14-272 (rel. Feb. 27, 2014); *Technology Transitions*, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket Nos. 13-5, 12-353, Second Protective Order, DA 14-273 (rel. Feb. 27, 2014).

Security and the Federal Aviation Administration. In addition, AT&T grandfathered numerous business TDM-based services in the two trial wire centers with no evidence of customer disruption.³ Further and importantly, AT&T's network and service quality metrics indicate that customers that voluntarily transitioned to AT&T's alternative services during the trial continue to receive the exceptional service quality and customer care that has been historically attributed to TDM-based services. In sum, AT&T is proud of its accomplishments in the Trials, and appreciates the participation of and dialogue with the stakeholders on the many complicated issues that were raised during this process.

During this same time period, the Commission issued two Orders in its Technology Transitions proceeding, establishing a framework and rules governing the technology transition including processes and standards for discontinuing retail voice services, and wholesale services, as well as, updating its copper retirement and CPE power requirements.⁴ While AT&T disagrees with, and has challenged, certain aspects of those Orders, the Commission has established the rules of the road for the IP transition.

As a result of the progress made in the Trials and the development of the regulatory requirements for the technology transition, AT&T hereby announces its decision to terminate the Wire Center Trials effective immediately. As we move forward, AT&T will apply key learnings from the Trials and will complete its technology transition from legacy TDM-based services on a broader scale outside the structure of the Trials.

As indicated above, certain information in the attached document have been clearly marked as highly confidential information and are entitled to protection pursuant to the terms of the Protective Order and Second Protective Order in the referenced dockets.

Please do not hesitate to contact me with any questions regarding this matter.

³ See AT&T July 1, 2016 Ex Parte and Q42015 Wire Center Trial Report at page 21. https://ecfsapi.fcc.gov/file/10701501528844/FCC%20Wirecenter%20Trial%20Q4%202015%20and%20Q1%202016%20Report_REDACTED%20AS%20FILED%2007%2001%202016.pdf. (AT&T will complete the withdrawal of these services as granted by the Commission, and the Alabama and Florida public utility commissions).

⁴ See Technology Transitions, GN Docket No. 13-5, *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers*, RM-11358, *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25, *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593, Report and Order, Order on Reconsideration and Further Notice of Proposed Rulemaking, (rel. Aug. 7, 2015); See also Technology Transitions, GN Docket No. 13-5, *USTelecom Petition for Declaratory Ruling That Incumbent Local Exchange Carriers Are Non-Dominant in the Provision of Switched Access Services*, WC Docket No. 13-3, *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers*, RM-11358, Declaratory Ruling, Second Report and Order, and Order on Reconsideration, (Rel. July 15, 2016).

Ms. Marlene Dortch, Secretary
January 19, 2017
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Sincerely,

/s/ Ola Oyefusi

ATTACHMENT – Final Wire Center Trial Report_Redacted_(AS FILED 011917)

cc: D. Kahn
P. Saharko
M. Berlove

AT&T Wire Center Trials: Final Report

January 19, 2016



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REPORT HIGHLIGHTS



Highlights

The following are a few Highlights from the Final Report.

- AT&T conducted more than 100 informational (outreach) events, including:
 - Technology training for seniors to improve IP awareness and adoption. (Slide 6)
 - Spanish language training about the IP transition and internet safety. (Slide 6)
 - Central office and cell site visits by FCC Commissioner and RAND Corp (Slide 6)
- AT&T's wire center activities encouraged dialogue with disability community about completing the transition from TDM to IP services, and how persons with disabilities would benefit from the transition to next generation services, e.g. HD Voice, RTT, and expanded broadband access. (Slides 7, 8)
- Since trial inception;
 - Voluntary transitions to AT&T consumer IP accounts increased by 72% in Carbon Hill, AL and 59% in West Delray Beach, FL. (Slide 10)
 - Combined data for both wire centers show that more than fifty percent of total consumer accounts as of 3Q2016 have voluntarily migrated to AT&T's next generation voice services. (Slide 11)
- Network metrics and customer service data show customers that voluntarily transitioned to AT&T's IP and wireless services during the trial continue to receive exceptional network performance, service quality, and customer care that has been historically attributed to legacy (TDM-based) services. (Slides 13, 15)
- AT&T grandfathered certain TDM-based interstate and intrastate business services in the two trial wire centers with no evidence of customer disruption. (Slide 16)



COMMUNITY OUTREACH

Project Highlights



Community Outreach Highlights, Q4 2014 – Q3 2016

Carbon Hill, Alabama



- AT&T convened the Carbon Hill Advisory Council to facilitate communications between AT&T and the community
- 61 informational events and meetings conducted with community leaders, organizations, local government.
- New statewide technology training initiative announced; AT&T partnered with the Alabama Department of Senior Services, the Alabama Department of Education and the Alabama Association of the Family, Career and Community Leaders of America (FCCLA) to offer technology training that paired students with senior citizens across Alabama.
- Central Office and cell site visits by: 1) FCC Commissioner Pai; and 2) RAND Corporation (an FCC consultant).

West Delray Beach, Florida



- 48 informational events and meetings conducted with community leaders, organizations, local government.
- Spanish language IP transition and Internet safety training; Train the Trainer event in partnership with Consumer Action and the Dominican Real Literacy Corporation.
- Public screening of the documentary “*Cyber-Seniors*”, a humorous and heartwarming feature documentary, focusing on a group of senior citizen’s first steps into cyber-space under the tutelage of teenage mentors. This spirited group of men and women digitally re-connect with their families and each other, illustrating the theme “you are never too old to make new connections and never too young to make a difference.” <http://cyberseniorsdocumentary.com/>
- Central Office and cell site visits by: 1) FCC Commissioner Pai; and 2) RAND Corporation (an FCC consultant).



Access by People with Disabilities

AT&T initiated broad and expeditious outreach activities to engage people with disabilities. For example:

- AT&T engaged the American Association of People with Disabilities (AAPD) to facilitate discussions with Community Based Organizations (CBOs) that represent the disability community.
- In the first three months of the trial 170 phone and email communications were made to:
 - 29 Community Based Organizations in Alabama
 - 37 Community Based Organizations in Florida
- Two presentations focused on benefits of HD Voice technology for people with hearing loss – highlighted research by Gallaudet University¹.

¹[Gallaudet University Ex Parte communications on the accessibility benefits of wideband audio \(HD Voice\).](#)



Access by People with Disabilities

Perspectives from American Association of People with Disabilities (AAPD) about the wire center trials:

- The trials increased awareness among national disability organizations and local disability organizations in AL and FL of the accessibility benefits of IP-based technologies.
- The trials provided opportunity to introduce people with disabilities in the trial areas to specific examples of how technology transition will affect accessibility in an all-IP environment (e.g., RTT, HD Voice, expanded access to broadband).
- The trials created a blueprint for effective outreach to state and local disability communities to raise awareness of the IP transition.
- The trials provided the disability community with the opportunity to work with industry partners to identify accessibility gaps that exist in specific IP-based technologies and determine how to resolve those issues.
- The trials enabled conversations among disability advocates, technology companies and government entities about existing regulations that need to be modified to better reflect an IP-based environment (e.g., transition to RTT).
- The trials also created a platform for discussions about how to improve access to modern assistive technology through equipment loan programs and other services.
- The trials enabled more diverse disability communities (e.g., low vision, hard of hearing, limited mobility, cognitive disabilities) to engage collectively in a comprehensive discussion about the impact of IP transition on different types of disabilities.



Transition Progress Summary

Description: Consumer and business customer activity transitioning from legacy TDM to IP service offerings within the trial wire centers.



Transition Progress Summary

Cumulative Change

The percentage changes in targeted TDM-based customer accounts that voluntarily transitioned to an IP or wireless service since trial inception on May 2014 through September 2016 are summarized as follows.

Carbon Hill, AL

	% Change From Baseline*
Consumer IP accounts	72%
Consumer TDM accounts	-36%
Simple Business IP accounts	35%
Simple Business TDM accounts	-28%

West Delray Beach, FL

	% Change From Baseline*
Consumer IP accounts	59%
Consumer TDM accounts	-38%
Simple Business IP accounts	48%
Simple Business TDM accounts	-25%

Combined WC Trial Progress Results

	% Change From Baseline*
Consumer IP accounts	60%
Consumer TDM accounts	-38%
Simple Business IP accounts	47%
Simple Business TDM accounts	-25%

*The baseline dates are as follows: May 31, 2014 for consumer accounts, September 30, 2014 for simple business accounts, and August 30, 2015 for complex business.



Combined Wire Center Migrations to AT&T IP by Quarter**



*The baseline dates are as follows: May 31, 2014 for consumer accounts, September 30, 2014 for simple business accounts, and August 30, 2015 for complex business accounts.

**IP includes U-verse and Wireless Home Phone



Network Performance Highlights

- Network metrics show AT&T maintains robust network performance regardless of technology used to offer service



Network Metric Summary

Defects per Million (DPM) by Service or Technology									
		2014	2015				2016		
		4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q
TDM	CH								
	KP								
CVOIP	CH								
	KP								
BVOIP	CH								
	KP								
FCC Reportable Outages									
No. of Outages	CH								
	KP								

Success Rates by Service or Technology									
		2014	2015				2016		
		4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q
TDM	CH								
	KP								
CVOIP	CH								
	KP								
BVOIP	CH								
	KP								
Wireless Accessibility	CH								
	KP								
Wireless Retainability	CH								
	KP								



Customer Care / Experience by type of Service



Consumer Call Center Highlights

Highlights from Calls tracked through the Interactive Voice Response (IVR) System

- Despite the fact that more than 50% of consumer accounts as of third quarter 2016 are AT&T's IP or wireless service, there was no spike in customer care calls from new IP accounts relative to legacy TDM accounts.
- The calls from U-verse accounts are mostly billing inquiries about new billing format or promotion information

Cumulative Call Volumes since May 2014

Total Calls Volume	U-verse	Legacy
Total Calls Route thru IVR		
Percent Split	47.34%	52.65%

Call Categories	U-verse	Legacy
Billing includes all billing Inquiries	49.18%	39.39%
Payment : Includes bill pay, payment inquiries, confirm payment, set-up auto payment	7.88%	13.72%
Acquire Service: Includes U-verse, Internet, other	5.81%	9.08%
Lifeline	0.21%	0.47%
Other: restore service, check status, change/moves, collections	36.92%	37.34%



Business Account Highlights

AT&T Grandfathered and received approval to sunset the following TDM-based (voice & data) business Services

Grandfathered Services*

Service Name	Jurisdiction	Grandfather Effective Date	Sunset Effective Date
TV1-Analog Video Service	Interstate	2/16/16	10/14/16
Analog Voice Grade Private Line	Interstate	2/16/16	10/14/16
Analog Private Line Wired Music	Interstate	2/16/16	10/14/16
Analog Voice Grade Private Line	Intrastate	2/16/16	9/30/17
Analog Private Line Wired Music	Intrastate	2/16/16	10/14/16
Measured Rate Trunk	Intrastate	2/16/16	10/14/16
Flat Rate Trunk	Intrastate	2/16/16	9/30/17
ISDN-Primary Rate Interface	Intrastate	2/16/16	9/30/17
ISDN-Basic Rate Interface	Intrastate	2/16/16	9/30/17
Centrex	Intrastate	2/16/16	9/30/17

* The wire center trial termination will not affect planned sunset of these grandfathered services.

